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BEFORE PROCEEDINGFEDERAL COMMUNICATIONS COMMISSION
REMITTANCE ADVICEApproved by OMB
3060-0589
Page 1 of 1

(1) LOCKBOX # 358145			
358145			
SECTION A - PAYER INFORMATION			
(2) PAYER NAME (if paying by credit card enter name exactly as it appears on the card) Dickstein Shaplo Morin & Oshinsky LLP		(3) TOTAL AMOUNT PAID (U.S. Dollars and cents) \$895.00	
(4) STREET ADDRESS LINE NO. 1 2101 L Street NW			
(5) STREET ADDRESS LINE NO. 2			
(6) CITY Washington		(7) STATE DC	(8) ZIP CODE 20037-1526
(9) DAYTIME TELEPHONE NUMBER (include area code) 202-833-5011		(10) COUNTRY CODE (if not in U.S.A.)	
FCC REGISTRATION NUMBER (FRN) REQUIRED			
(11) PAYER (FRN) 0004-2711-10			
IF MORE THAN ONE APPLICANT, USE CONTINUATION SHEETS (FORM 159-C) COMPLETE SECTION BELOW FOR EACH SERVICE, IF MORE BOXES ARE NEEDED, USE CONTINUATION SHEET			
(13) APPLICANT NAME Startec Global Operating Company			
(14) STREET ADDRESS LINE NO. 1 1151 Seven Locks Road			
(15) STREET ADDRESS LINE NO. 2			
(16) CITY Potomac		(17) STATE MD	(18) ZIP CODE 20854
(19) DAYTIME TELEPHONE NUMBER (include area code) 301-610-4646		(20) COUNTRY CODE (if not in U.S.A.)	
FCC REGISTRATION NUMBER (FRN) REQUIRED			
(21) APPLICANT (FRN) 0007-7159-15			
COMPLETE SECTION C FOR EACH SERVICE, IF MORE BOXES ARE NEEDED, USE CONTINUATION SHEET			
(23A) CALL SIGN/OTHER ID 214	(24A) PAYMENT TYPE CODE CUT	(25A) QUANTITY 1	
(26A) FEE DUE FOR (PTC) \$895.00	(27A) TOTAL FEE \$895.00		
(28A) FCC CODE 1		(29A) FCC CODE 2	
(23B) CALL SIGN/OTHER ID	(24B) PAYMENT TYPE CODE	(25B) QUANTITY	
(26B) FEE DUE FOR (PTC)	(27B) TOTAL FEE		
(28B) FCC CODE 1		(29B) FCC CODE 2	
SECTION D - CERTIFICATION			
CERTIFICATION STATEMENT I, <u>Lab Miller</u> , certify under penalty of perjury that the foregoing and supporting information is true and correct to the best of my knowledge, information and belief.			
SIGNATURE <u>[Signature]</u>		DATE <u>7/13/05</u>	
SECTION E - CREDIT CARD PAYMENT INFORMATION			
MASTERCARD _____ VISA _____ AMEX _____ DISCOVER _____			
ACCOUNT NUMBER _____		EXPIRATION DATE _____	
I hereby authorize the FCC to charge my credit card for the service(s)/authorization herein described.			
SIGNATURE _____		DATE _____	

SEE PUBLIC BURDEN ON REVERSE

FCC FORM 159

FEBRUARY 2003 (REVISED)

DICKSTEIN SHAPIRO MORIN & OSHINSKY LLP

2101 L Street NW • Washington, DC 20037-1526

Tel (202) 785-9700 • Fax (202) 887-0689

Writer's Direct Dial: (202) 955-6680

E-Mail Address: HubbardA@dsmo.com

July 13, 2005

Via Courier

Marlene H. Dortch
Secretary
Federal Communications Commission
Wireline Competition Bureau - CPD - 214 Appls.
P.O. Box 358145
Pittsburgh, PA 15251-5145

Re: In the Matter of the Application of Startec Global Operating Company and PT-1
Communications, Inc., PT-1 Long Distance, Inc. For Domestic Section 214 Authority
To Transfer Assets

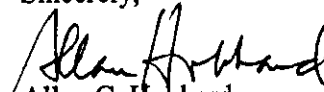
Dear Ms. Dortch:

On behalf of Startec Global Operating Company, PT-1 Communications, Inc. and PT-1 Long Distance, Inc. (together the "Applicants"), enclosed please find an original and six (6) copies of an application for Commission Approval for PT-1 Communications, Inc. and PT-1 Long Distance, Inc. to transfer assets used in providing domestic communications services to Startec Global Operating Company. Applicants are simultaneously filing an electronic section 214 Application to transfer international assets with the International Bureau.

Also enclosed is an FCC Form 159 Remittance Advise and check in the amount of \$895.00, payable to the Federal Communications Commission, which satisfies the filing fee required for this application under line 2.b of Section 1.1105 of the Commissions rules.

Please date-stamp the additional enclosed copy of this filing marked "STAMP & RETURN" and return it to our courier. Please do not hesitate to contact us if you have any questions regarding this filing.

Sincerely,


Allan C. Hubbard

Counsel to Startec Global Operating Company.

ACH/tjm

cc: Robert Felgar (Startec)
Tracy Wilson-Parker (FCC)
Rene Crittendon (FCC)

1177 Avenue of the Americas • New York, NY 10036-2714

Tel (212) 835-1400 • Fax (212) 997-9880

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CERTIFICATION STATEMENT I, <u>Joe Miller</u> , certify under penalty of perjury that the foregoing and supporting information is true and correct to the best of my knowledge, information and belief.			
SIGNATURE <u>[Signature]</u>		DATE <u>7/13/05</u>	
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SIGNATURE _____		DATE _____	

SEE PUBLIC BURDEN ON REVERSE

FCC FORM 159

FEBRUARY 2003 (REVISED)

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of the Application of)
)
)

STARTEC GLOBAL OPERATING)
COMPANY,)

Transferee,)

and)
)
)

PT-1 COMMUNICATIONS, INC.,)
PT-1 LONG DISTANCE, INC., and)
Transferors,)
)

For International and Domestic Section 214)
Authority To Transfer Assets)
_____)

File No. _____

WC Docket No. _____

I. INTRODUCTION

Startec Global Operating Company ("Startec"), PT-1 Communications, Inc. and PT-1 Long Distance, Inc. (PT-1 Communications, Inc. and PT-1 Long Distance, Inc., collectively, "PT-1") (Startec and PT-1, together, the "Applicants") hereby request authority pursuant to Section 214 of the Communications Act of 1934, as amended,¹ and Sections 63.04(b) and 63.24(e) of the Commission's Rules,² for PT-1 to transfer substantially all of its assets to Startec. The proposed asset transfer does not involve a transfer of control of PT-1, an assignment of PT-1 Long Distance, Inc.'s ("PT-1 LD") international Section 214 authorization, or a transfer of presubscribed customers. As described in more detail below, the proposed transaction involves Startec's acquisition of the assets related to PT-1's dial around business.

¹ 47 U.S.C. § 214.

² 47 C.F.R. §§ 63.04(b), 63.24(e).

Startec³ is a facilities-based provider of communications services, including voice, data and Internet access. The company markets its services to ethnic businesses, residential communities located in major metropolitan areas, to international long distance carriers and to Internet service providers transacting with the world's emerging economies.

PT-1 provides "dial-around" or "10-10" service to casual users⁴ primarily using the carrier access code ("CAC") 1016868.⁵ PT-1 also provides pre-subscribed interexchange services to a small number of customers.⁶

II. INFORMATION REQUIRED UNDER SECTIONS 63.04(b) AND 63.24(e)

In support of this Application, Applicants submit the following information pursuant to Sections 63.04(b) and 63.24(e) of the Commission's rules.⁷

A. Information Required By Section 63.18(a) through (d), and (h) through (p):

(1) 63.18(a) -- Name, address and telephone number of each applicant.

Transferee: Startec Global Operating Company FRN: 0007715923
7361 Calhoun Place, Suite 650
Rockville, MD 20855
Tel: (301) 610-4646

³ Startec is a wholly owned subsidiary of Startec Global Communications Corporation.

⁴ Dial-around users are "casual users" in the sense that (i) they decide on a call-by-call basis whether or not to use the dial-around service; (ii) they do not have to subscribe in order to take advantage of the service; and (iii) they generally do not receive monthly bills directly from the dial-around provider. (Dial-around calls, if any, are routinely billed through the applicable local exchange carrier.) Thus, PT-1 does not have customers in the same sense as a traditional long distance company.

⁵ PT-1 has three CACs assigned to it by the North American Numbering Plan Administration, including 1016868, all of which are being transferred to Startec pursuant to this transaction.

⁶ These customers are not among the assets being sold to Startec. In addition, PT-1 Technologies, Inc., a wholly-owned subsidiary of PT-1 Communications, Inc., is a party to the Purchase Agreement. PT-1 Technologies does not provide any interstate telecommunications services and therefore is not a party to this Application.

⁷ 47 C.F.R. §§ 63.04(b), 63.24(e).

Fax: (240) 314-4219

Transferors: PT-1 Communications, Inc
30-50 Whitestone Expressway
Flushing, NY 11354
Tel: (718) 939-9000

FRN: 0004-2703-85

PT-1 Long Distance, Inc.
30-50 Whitestone Expressway
Flushing, NY 11354
Tel: (718) 939-9000

FRN: 0004-3396-77

(2) 63.18(b) -- State of organization.

Transferee: Startec is organized under the laws of the State of Delaware.

Transferors: PT-1 Communications, Inc. ("PT-1 Communications") is
organized under the laws of the State of New York.
PT-1 LD is organized under the laws of the State of Delaware.

(3) 63.18(c) -- Contact person for this Application.

Correspondence and communications concerning this Application should be
directed to Applicants' respective counsel of record:

For Transferee:

Robert Felgar
Corporate Counsel
Startec Global Communications Corporation
7361 Calhoun Place, Suite 650
Rockville, MD 20855
Tel: (301) 610-4646
Fax: (240) 314-4219
Email: robert.felgar@startec.com

For Transferors:

Steven Augustino
Katherine Barker
Kelley Drye & Warren LLP
1200 19th Street NW, Suite 500
Washington, D.C. 20036-2423
Tel: (202) 955-9608
Fax: (202) 955-9792
Email: saugustino@kelleydrye.com
Email: kbarker@kelleydrye.com

(4) 63.18(d) – International Section 214 Authorizations.

Transferee: Startec is authorized to operate as a facilities-based and resale carrier of international services pursuant to a Section 214 authorization granted by the Commission in FCC File Nos. ITC-89-099 and ITC-97-379.⁸

Transferors: PT-1 LD is authorized to operate as a facilities-based and resale carrier of international services pursuant to a Section 214 authorization granted by the Commission in File No. ITC-214-19990505-00348. PT-1 Communications is authorized to operate as a facilities-based and resale carrier of international services pursuant to a Section 214 authorization granted by the Commission in File No. ITC-214-1997-0516-00274.

(5) 63.18(h) -- Ownership of Transferee.

Startec is a wholly owned subsidiary of Startec Global Communications Corporation, a Delaware USA Corporation ("Startec Parent"). The issued and outstanding shares of Startec Parent are held by Allied Capital Corporation ("Allied") (68.5%), NTFC Capital Corporation ("NTFC") (24%), and various other bankruptcy creditors (none holding greater than 1%).

Allied is a publicly traded company. No person or entity directly or indirectly owns 10% or more of the equity of Allied, and no officer or director of Allied is also an officer or director of a foreign carrier. Allied is a Maryland Corporation with its principal executive office located at 1919 Pennsylvania Avenue, NW, Washington D.C. Allied's primary business is to provide long-term debt and equity financing to established middle-market companies.

NTFC is a Delaware Corporation with principal offices located at 10 Riverview Drive, Danbury, CT 06810. The principal business of NTFC is commercial lending.

NTFC is a wholly owned subsidiary of General Electric Capital Corporation, a Delaware corporation with principal executive offices located at 260 Long Ridge Rd, Stamford, Connecticut 06927. The principal business of General Electric Capital Corporation is financial services.

General Electric Capital Corporation is a wholly owned subsidiary of General Electric Capital Services, Inc., a Delaware corporation with its principal executive offices located at 260 Long Ridge Road, Stamford, CT 06927. General Electric Capital Services, Inc. is an intermediate holding company.

⁸ See 4 FCC Rcd 6953 (1989) and 12 FCC Rcd 13325 (1997).

General Electric Capital Services, Inc. is a wholly owned subsidiary of the General Electric Company, a New York corporation with principal executive offices located at 3135 Easton Turnpike, Fairfield, Connecticut 06431. The General Electric Company is engaged in developing, manufacturing and distributing a wide variety of products. Through subsidiaries, it provides a broad spectrum of financial services. It also owns through other subsidiaries certain television broadcast licenses and the NBC television network.

The General Electric Company is a publicly traded company. No single person or entity directly or indirectly owns 10% or more of the General Electric Company.

No other person or entity directly or indirectly owns ten percent (10%) or more of the equity of the Transferee.

Following consummation of the proposed transaction, there will be no interlocking directorates with any foreign carrier.

(6) 63.18(i) – Foreign Affiliations.

Startec certifies that it is not a foreign carrier. Startec certifies, however, that it has affiliations within the meaning of Section 63.09 of the Commission's rules with several non-dominant foreign carriers. Exhibit B, attached hereto, is a list of Startec's foreign affiliations and the countries in which they operate.

(7) 63.18(j) -- Startec certifies that pursuant to this application it is seeking authority after acquisition of the Assets to continue providing international telecommunications services to all of the countries for which Startec is currently authorized, which includes all of the countries listed in Exhibit B.

(8) 63.18(k) – All of the countries in which Startec has foreign affiliates are Members of the World Trade Organization, as set forth in 47 C.F.R. § 63.18(k)(1).

(9) 63.18(l) -- Startec may resell the international switched services of unaffiliated U.S. carriers for the purpose of providing telecommunications services to any of the countries listed in Exhibit B. Each of Startec's foreign affiliates lacks 50 percent market share in the international transport and the local access markets on the foreign end of the route, as set forth in 47 C.F.R. § 63.10(a)(3).

(10) 63.18(m) -- Each of Startec's foreign affiliates lacks 50 percent market share in the international transport and the local access markets on the foreign end of the route, as set forth in 47 C.F.R. § 63.10(a)(3). Startec therefore qualifies for non-dominant treatment on all international routes.

(11) 63.18(n) – No special concessions. Startec certifies that it has not agreed to accept special concessions, as defined in Section 63.14(b) of the Commission's

Rules, directly or indirectly, from any foreign carrier with respect to any U.S. international route where the foreign carrier possesses market power on the foreign end of the route, and will not enter into such agreements in the future.

- (12) 63.18(o) – Certification. Startec and PT-1 certify pursuant to Sections 1.2001 through 1.2003 of the Commission's rules that to the best of their knowledge no party to this application is subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 3301.
- (13) 63.18(p) – Streamlined processing. Applicants submit that this Application qualifies for streamlined processing pursuant to Section 63.12 of the Commission's rules. As previously found by the Commission, Startec has no affiliations with foreign carriers that possess market power in their destination markets, as set forth in Section 63.12(c)(1)(i)-(iv) of the Commission's rules. In addition, Applicants are not seeking authority to provide switched basic services over private lines to a country for which the Commission has not previously authorized the provision of such services over private lines.

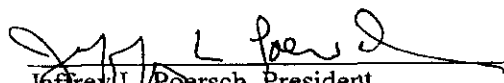
B. Information Required By Section 63.04(b)

Attached hereto as **Exhibit A** is the additional information required under paragraphs (a)(6) through (a)(12) of Section 63.04 of the Commission's rules.

III. CONCLUSION

Wherefore, for the reasons stated herein, Applicants respectfully submit that the public interest, convenience and necessity would be furthered by grant of this Application for international and domestic Section 214 authority for PT-1 Communications, Inc. and PT-1 Long Distance, Inc. to transfer assets to Startec Global Operating Company.


Respectfully submitted,


Jeffrey L. Poersch, President
Startec Global Operating Company

Bryan L. Engle, Chief Executive Officer
PT-1 Communications, Inc.
PT-1 Long-Distance, Inc.

Dated: June 30, 2005

Jeffrey L. Poersch, President
Startec Global Operating Company



Bryan L. Engle, Chief Executive Officer
PT-1 Communications, Inc.
PT-1 Long-Distance, Inc.

Dated: June 30, 2005

LIST OF ATTACHMENTS

EXHIBIT A **Additional Information Required under Section 63.04(a)(6)
through (a)(12)**

EXHIBIT B **Startec Global Operating Company Foreign Affiliations**

CERTIFICATION OF TRANSFEREE

CERTIFICATION OF TRANSFERORS

EXHIBIT A

Additional Information Required under Section 63.04(a)(6) through (a)(12) For a Domestic Section 214 Asset Transfer Application

(a)(6) Description of the transaction.

PT-1 Communications, its two wholly-owned subsidiaries, PT-1 LD and PT-1 Technologies, and Startec entered into an Asset Purchase Agreement dated as of June 30, 2005 ("APA"), pursuant to which PT-1 agreed to sell substantially all of its assets and to transfer certain of its liabilities to Startec.⁹ PT-1, with the assistance and guidance of its independent advisors, completed an evaluation of PT-1's future business direction. Based upon its review and consideration of the analysis prepared by management, PT-1's Board of Directors elected to dispose of PT-1's telecommunications business in the asset sale transaction described herein.

The assets to be transferred include substantially all of the assets of PT-1's "dial-around" or "10-10" telecommunications operations, including PT-1's assigned CACs (the "Acquired Assets").¹⁰ The Acquired Assets do not include the small number of presubscribed customers served by PT-1. These customers will remain with PT-1; Startec will provide PT-1 with network services to allow PT-1 to serve those customers until such time as PT-1 decides to discontinue its service. The consideration for the Acquired Assets and operations is a cash payment to PT-1 by Startec and Startec's assumption of certain designated liabilities. Closing of the APA is contingent upon obtaining the approval of the Federal Communications Commission and various state public utilities commissions, the approval of PT-1's lenders, and other customary closing conditions.

(a)(7) Description of geographic areas served by Applicants and their affiliates.

Transferee: Startec offers domestic and international long distance services to residential customers nation-wide with its Dial-1 and 10-10-719 dial-around services. Startec's long distance customers tend to be concentrated in major metropolitan areas on the east and west

⁹ The parties also executed a Transition Services Agreement ("TSA") pursuant to which Startec agrees to provide certain management services to PT-1, subject to PT-1's direction and control. Applicants will provide the Commission with copies of the APA and/or TSA upon request.

¹⁰ In addition, PT-1 Technologies, Inc., a wholly-owned subsidiary of PT-1 Communications, Inc., is a party to the Purchase Agreement. PT-1 Technologies does not provide any interstate telecommunications services and therefore is not a party to this Application.

coasts of the United States. Startec also provides its long distance services primarily to small and medium-sized ethnic enterprises, as well as to mid-sized business customers, often in conjunction with dial-up Internet access, domestic and international private line services, and other products.

Startec is affiliated with Guam Cable Group, Inc., which provides service as a carriers' carrier in Guam and the Commonwealth of the Northern Marianas Islands through a combination of owned and leased telecommunications transmission facilities. Guam Cable Group, Inc. does not provide telecommunications services to end users.

As a result of General Electric Capital Corporation's ("GECC's") ownership interest in Startec, Startec is also affiliated with other telecommunications companies offering domestic telecommunications services. GECC has an approximate 18% common equity ownership interest in KMC Telecom Holdings, Inc., the ultimate parent company of various KMC subsidiaries (KMC Telecom III, Inc., KMC Telecom V, Inc., KMC Data LLC) that are authorized to provide local and long distance telecommunications services virtually nationwide. Additionally, GECC is the sole member of Indiana Fiber Works LLC, a company that offers dark fiber in Indiana. Finally, it is anticipated that GECC will have an approximate 14% limited voting common equity ownership interest in Choice One Communications, Inc. following its emergence from bankruptcy later this month. Choice One Communications, Inc. has several operating subsidiaries that offer voice and data services, including Internet solutions, to business customers in 12 Midwest states.

Transferors: PT-1 LD primarily provides dial-around services to casual users located in the following 37 states via the carrier access code 1016868: Alabama, Arkansas, Arizona, California, Colorado, Connecticut, District of Columbia, Delaware, Florida, Georgia, Idaho, Illinois, Indiana, Kentucky, Louisiana, Massachusetts, Maryland, Michigan, Minnesota, Missouri, North Carolina, Nebraska, New Jersey, New Mexico, Nevada, New York, Ohio, Oklahoma, Oregon, Pennsylvania, Rhode Island, Tennessee, Texas, Virginia, Washington, Wisconsin and West Virginia. PT-1 LD also has a small number of presubscribed customers in some of these states (not part of the asset transfer described herein). PT-1 Communications, the parent of PT-1 LD, does not provide domestic interstate telecommunications service. PT-1 Technologies, PT-1 LD's affiliate, does not provide domestic

interstate telecommunications services. PT-1 has no affiliates that provide domestic telecommunications services.

(a)(8) Streamlined Treatment.

Applicants respectfully submit this Application qualifies for streamlined treatment pursuant to Section 63.03(b)(2)(i) because none of the applicants, nor their affiliates, are dominant with respect to any service. In addition, Startec will have a market share in the interstate, interexchange market of less than 10 percent following the transfer of assets and will provide services exclusively in geographic areas served by a dominant local exchange carrier that is not a party to the transaction. Consequently, the proposed asset transfer has no potential to result in harm to the public interest.

(a)(9) Related Applications.

Other than the international Section 214 portion of this Application, no other FCC applications relate to the transaction that is the subject of this Application.

(a)(10) Special Consideration.

Applicants anticipate that the asset transfer described herein will occur shortly after receipt of Commission approvals and therefore respectfully request that this Application be placed on public notice as soon as possible.

Applicants are not requesting special consideration of this Application because of an imminent business failure.

(a)(11) Waiver Requests.

No waiver requests have been filed in conjunction with this transaction.

(a)(12) Statement of Public Interest.

Grant of this Application will serve the public interest by enhancing competitive choices for telecommunications consumers. Specifically, the proposed transaction will benefit consumers by accelerating Startec's ability to offer a broad range of domestic telecommunications products and services. By enhancing Startec's ability to provide innovative and diversified services, and to expand its operations in a cost-effective manner, the asset transfer will enable Startec to strengthen its competitive position. These enhancements in turn will ultimately inure to the benefit of consumers by promoting innovation and furthering competition among providers in the domestic and international telecommunications marketplace.

Following the transfer, any dial-around casual users will continue to receive services which will be consistent with the quality of services currently provided by PT-1 and which will be supported by Startec's experienced and well-qualified management team. The rates for dial-around service will not increase, and in fact are likely to decrease, after the proposed asset acquisition is completed. The public interest therefore will be served by approval of this Application.

Finally, expedited consideration of this Application will serve the public interest by permitting Applicants to more speedily bring about the competitive benefits that will inure from permitting the combined Startec to strengthen its presence in the domestic and international services marketplace. Applicants therefore respectfully request that the Commission grant approval of this Application as soon as possible.

EXHIBIT B

**Startec Global Operating Company
Foreign Affiliations**

<u>Company</u>	<u>License(s) Held</u>
Startec Global Communications U.K. Ltd. (wholly owned Startec Parent subsidiary)	(U.K.) General Conditions of Entitlement Authorization (Ireland) General Telecom License (Austria) License for the provision of voice telephone by self- operated telecommunications network (Australia) License not required (New Zealand) Registered as an operator under the Telecom (International Services) Regulations 1994
Startec Global Communications (Switzerland) GmbH (wholly owned Startec Parent subsidiary)	(Switzerland) Registered for the supply of Telecom Services
Startec Global Communications Company (Canada) (wholly owned indirect Startec Parent subsidiary)	(Canada) Class A License -- Section 16.3
Vancouver Telephone Company Limited (Canada) (wholly owned indirect Startec Parent subsidiary)	(Canada) Class A License -- Section 16.3
Conectel Telecomunicaciones S.A. (indirect subsidiary controlled by Allied)	(Argentina) Paging license
Radiofon de Columbia Ltda., (indirect subsidiary controlled by Allied)	(Colombia) Paging license

Maxtel S.A.,
(indirect subsidiary controlled by Allied)

(Colombia) Paging license

Promptel Comunicações S/A
(indirect subsidiary controlled by Allied)

(Brazil) Special Paging Service
License

Alfa Radiochamada S/A
(indirect subsidiary controlled by Allied)

(Brazil) Special Paging Service
License

Peigim Comunicações e Serviços Ltda
(indirect subsidiary controlled by Allied)

(Brazil) Special Paging Service
License

Coopernet
(indirect subsidiary controlled by Allied)

(Brazil) Private Mobile Limited
Service (SLMP) license

Universal Network Technology S/A
(indirect subsidiary controlled by Allied)

(Brazil) Agreements with Coopernet
pursuant to which it renders
services to end-users through
the licenses held by
Coopernet.